



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 24, 2020

BY ECF

The Honorable William H. Pauley III
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Amilcar Romero et al.*, 19 Cr. 734 (WHP)

Dear Judge Pauley:

The Government respectfully writes on behalf of the parties in response to the Court's April 9, 2020 Order (Doc. No. 50) directing the parties to confer and submit a proposed motions schedule.

The parties have conferred and propose the following schedule: Defense motions due on or before August 21, 2020; Government responses due on or before September 11, 2020; and defense replies due on or before September 18, 2020.

Furthermore, the Government moves to exclude time under the Speedy Trial Act, pursuant to Title 18, United States Code, Section 3161(h)(1)(A), until September 18, 2020. The Government submits that the ends of justice served by such an exclusion outweigh the best interests of the defendants and the public in a speedy trial, because such an exclusion will allow the defendants and their counsel time to continue reviewing the voluminous discovery in this case, evaluating whether any motions are appropriate, and discussing with the Government potential pretrial resolutions of this matter. In addition, such an exclusion will also ensure the effective assistance of counsel and prevent any miscarriage of justice. Defense counsel consent to this motion.

Application granted. The Court adopts the proposed motion schedule and will hear argument on the motions on September 30, 2020 at 2:00 p.m. Time waived in the interest of justice until September 30, 2020.

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

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April 24, 2020

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney


Michael D. Longyear

Justin V. Rodriguez
Jacob E. Warren
Assistant United States Attorneys
(212) 637-2223 / 2591 / 2264